

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

FAIR ISAAC CORPORATION, a Delaware corporation,)	Case No. 16-cv-1054 (WMW/DTS)
)	
)	
Plaintiff,)	
)	
v.)	
)	
FEDERAL INSURANCE COMPANY, an Indiana corporation, and ACE AMERICAN INSURANCE COMPANY, a Pennsylvania corporation.)	
)	
)	
Defendants.)	

JOINT MOTION REGARDING CONTINUED SEALING

Documents have been filed under temporary seal in connection with Defendants' Letter Request, Dkt. Nos. 208 - 216. Pursuant to Local Rule 5.6, the parties submit this Joint Motion Regarding Continued Sealing.

DKT. NO.	DESCRIPTION OF DOCUMENT	MARK "X" IN APPLICABLE COLUMN			NONPARTY THAT DESIGNATED DOCUMENT CONFIDENTIAL (IF ANY)	REASON WHY DOCUMENT SHOULD REMAIN SEALED OR BE UNSEALED
		Parties Agree Doc. Should Remain Sealed	Parties Agree Doc. Should Be Unsealed	Parties Disagree		
208	Defendant's Letter Request to Magistrate Judge Schultz regarding Deposition Limits, 30(b)(6) Deposition Topics 4 and 6, and Trial Preservation Depositions – Filed Under Seal	X			N/A	This document should remain sealed. This letter was filed under seal to protect the Parties' commercially confidential information. This commercially confidential information includes the terms of the Software License Agreement that is the subject of this dispute. The license agreement was designated as confidential by Plaintiff under the Protective Order. This document also contains excerpts and quotations from documents FICO has designated

						Confidential, Attorneys' Eyes Only under the Protective Order, which contain FICO's confidential business information.
209 – Tab A	Plaintiff Fair Isaac Corporation's Initial Disclosures dated March 17, 2017		X		N/A	
210 – Tab B	Excerpts from the Deposition Transcript of Christopher Ivey dated January 30, 2019	X			N/A	This document should remain sealed. This document was filed under seal to protect FICO's commercially confidential information. The deposition transcript of Christopher Ivey has been designated Confidential, Attorneys' Eyes Only under the Protective Order because it reveals FICO's confidential

						business information.
211 – Tab C	Plaintiff Fair Isaac Corporation's Third Supplemental Initial Disclosures dated February 22, 2019		X		N/A	
212 – Tab D	Defendant Federal Insurance Company's Amended Notice of 30(b)(6) Deposition of Plaintiff Fair Isaac Corporation		X		N/A	
213 – Tab E	Defendant Federal Insurance Company's Renewed and Second Amended Notice of 30(b)(6) Deposition of Plaintiff Fair Isaac Corporation		X		N/A	

214 – Tab F	February 17, 2019 Email from H. Kliebenstein to L. Janus	X			N/A	This document should remain sealed. This document reveals the content of confidential communications between Counsel for both Parties. Counsel discussed documents that have been marked Confidential, Attorney's Eyes Only under the Protective Order. This includes information regarding FICO's confidential software pricing methods. FICO would experience economic harm, including competitive harm, if its pricing information was made public. FICO's competitors could use this information to target FICO's customers and undercut FICO's pricing. Public
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						knowledge of FICO's pricing information would also place FICO at a disadvantage when negotiating with potential customers.
215 – Tab G	January 29, 2019 Email from L. Janus to A. Hinderaker	X			N/A	This document should remain sealed. This document reveals the content of confidential communications between Counsel for both Parties. Counsel discussed documents that have been marked Confidential, Attorney's Eyes Only under the Protective Order. This includes information regarding FICO's confidential software pricing methods. FICO would experience economic harm, including competitive harm, if its pricing information was

						made public. FICO's competitors could use this information to target FICO's customers and undercut FICO's pricing. Public knowledge of FICO's pricing information would also place FICO at a disadvantage when negotiating with potential customers.
216 – Tab H	August 28, 2013 email from Oliver James Clark to Richard Hill	X			N/A	This document should remain sealed. FICO designated this document Confidential, Attorneys' Eyes Only under the Protective Order in order to protect the commercially confidential information it contains. This includes information regarding FICO's confidential software pricing methods. FICO would

						experience economic harm, including competitive harm, if its pricing information was made public. FICO's competitors could use this information to target FICO's customers and undercut FICO's pricing. Public knowledge of FICO's pricing information would also place FICO at a disadvantage when negotiating with potential customers.
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Dated: March 27, 2019

/s/ Michael A. Erbele

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